



July 24, 2009

Mr. Michael Hom, Environmental Engineer  
Clean Water Enforcement Branch  
Water Protection Division  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

Re: Information Request – Section 308 of the Clean Water Act  
Dalton Utilities Land Application System (LAS) Permit No. GA02-056

Dear Mr. Hom,

Per our conversation on July 22, 2009, please find attached four maps of Dalton Utilities Land Application System indicating the locations of the samples collected per the aforementioned Information Request.

Attachment A indicates the locations of the samples collected from the sprayheads in the fields served by the three pump stations, pump stations B, C, and AC, in accordance with Section A.3.(a) of the aforementioned Information Request. The nomenclature of the sample results begins with “SP” indicating a sprayhead sample. The first letter of the sprayfield in which the sprayhead is located indicates which pump station serves the field. For example, Sample ID “SP BA2” is a sample from a sprayhead in sprayfield BA2 which is served by pump station B.

Attachment B specifies the surface water monitoring locations where samples were collected in accordance with Section A.3.(b) of the aforementioned Information Request and are named River R1 through R4.

Attachment C denotes the locations of the soil samples that were collected in accordance with Section A.3.(c) of the aforementioned Information Request. The nomenclature of the soil samples are indicative of the sprayfield in which the samples were collected the same as the sprayfield sample result nomenclature.

Lastly, Attachment D illustrates the locations of the ground water monitoring well samples which were collected in accordance with Section A.3.(d) of the aforementioned Information Request. The nomenclature of the sample results begins with “MW” for

Mr. Michael Hom  
July 24, 2009  
Page 2 of 2

monitoring well and is followed by the name of the monitoring well (i.e. MW M10 is monitoring well M10).

As was noted in our correspondence dated July 20, 2009, Dalton Utilities is evaluating its composting operation. Samples were collected on various ages of compost and analyzed using the Toxicity Characteristic Leaching Potential (TCLP) test to determine the leaching potential, if any, of PFOA and PFOS from the finished compost. We are currently awaiting the results and will develop an appropriate course of action based upon the test results once received.

Additionally, Dalton Utilities, through our partnership with the Sustainability Division of the Georgia Department of Natural Resource (DNR), is conducting a potential source assessment of our wastewater collection system. The Sustainability Division has verbal commitments for technical support from the University of Georgia and Georgia Institute of Technology and is currently preparing a scope of work to include the gathering and validation of information from industrial facilities regarding current and historic PFC usages as well as additional monitoring of the Conasauga River to determine the changes over time in the river.

As always, Dalton Utilities will update you as these projects proceed.

If you have any questions, please contact me at 706-529-1091 or [dcope@dutil.com](mailto:dcope@dutil.com).

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,



Don Cope  
President & CEO

Attachments (4)

C: Dr. Carol Couch, Georgia Environmental Protection Division (cover letter only)  
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)  
Lee A. DeHihns, Esq.